





Commissioner Michael J. Copps Federal Communications Commission 445 Twelfth Street, S.W. Washington. D.C. 20554

Re: Exparte contact in CC Docket Nos. 96-45. 98-171, 90-571, 92-237, 99-200 and 95-1 16; Universal Service Contribution Reform

Dear Commissioner Copps:

Cargill, Inc. is pleased that the Commission is considering new methods for Funding universal service. The current approach, which assesses contribution obligations based on interstate and international revenues, is uneconomic and therefore unsustainable and should be replaced with a method that assesses contribution obligation based on lines and activated wireless numbers. Cargill, however, strongly objects to a recent proposal made by certain state regulators to freeze the assessments attributable to residential lines.

Cargill, Inc. is one of many business customers paying a federal universal service surcharge of between 8% and 10.6%. This revenue-based percentage charge requires high-volume users to pay a disproportionate amount of universal service costs. As a result, the current system discourages use ofproductivity-enhancing communications technologies and creates a strong financial incentive for high-volume customers to use alternative technologies and service packages to reduce their costs - not a good result as our country fights its way out ofrecession.

The Commission should replace the current revenue-based universal service surcharge with a more equitable charge that would apply to every customer's connection to the network – to residential and business lines on wireline networks and activated telephone numbers on wireless networks. The Commission has requested comment on a universal service Funding plan that includes such line and number charges, proposed by a coalition consisting of The Ad Hoc Telecommunications Users Committee, AT&T, e-TUG, and WorldCom. Under this proposal, increases and decreases in universal service subsidies would be reflected in uniform percentage adjustments to all per line and wireless number charges. Cargill. Inc. urges you to adopt this connection-based proposal.

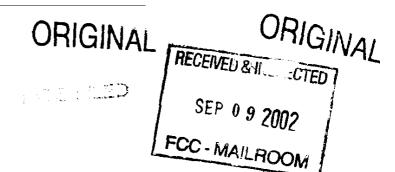
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Very truly yours,

Manager, Global Network Services

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Re: *Exparte* contact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116; Universal Service Contribution Reform

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August 22.2002

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Re: *Ex parte* contact in CC Docket Nos. 96-45, 98-171, 90-571, 92-<u>237, 99-200</u> and <u>95-1</u> **16**: Universal Service Contribution Reform

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∠Larry Ges_ini

Manager, Global Network Services

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Re: Exparrecontact in CC Docket Nos. 96-45, 98-171, 90-571, 92-237, 99-200 and 95-116: Universal Service Community Reform

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